

**Affidavit of Witness**

I, **Young Rang Spearman**, residing at [REDACTED],  
[REDACTED], being of legal age, depose and say that:

1. I am 45 years old and I am the wife of William "Bill" Spearman.
2. I am also the mother of Bill's 9-year old son, Max.
3. On Wednesday, November 8, 2023, I participated in a video conference via Zoom with Assistant Federal Public Defender Scott Berry and his Investigator Sarah Shannon.
4. During that video conference, Mr. Berry showed me two redacted photographs.
5. The first photograph appeared to depict Max taking a bath. I could not see his face because of the redactions, but the bathtub looked like an insert we used to give Max baths when he was younger and he was surrounded by his bath toys.
6. The second photograph was too heavily redacted for me to be able to identify. However, Mr. Berry advised this was a photograph of the genital area of a young boy and that the government believes the young boy is Max. Mr. Berry further advised that the photograph depicts the boy's scrotum and that the area appears to be red in color.
7. I do not have a specific recollection of the circumstances under which either photograph was taken. However, I have taken similar pictures of my son and sent them to my husband in the past.
8. For example, I have taken and texted pictures to Bill of things I have found on Max's body (e.g., a rash or a cut) when I have had concerns about whether it was necessary to bring Max to the doctor to examine those things. I have also sent Bill pictures of Max doing all kinds of things – playing, eating, sleeping, and even taking a bath.
9. I have no belief whatsoever that Bill has ever done anything sexual to Max nor do I believe he would.
10. As Max's mother, I would like him to continue to have a relationship with his father while he is in prison and once he is released for as long as he (Max) wants to have that relationship.

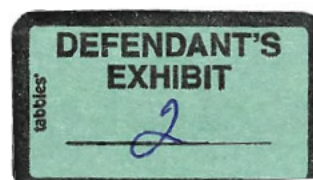
By: [Signature]  
Affiants Name and Signature

Date:



STATE OF ALABAMA )  
COUNTY OF MADISON )

BEFORE ME, the undersigned authority personally appeared Young Spearman, who ( ) is personally known to me or ( ) who presented Drivers License as identification and who did



acknowledge before me that he executed the foregoing instrument for the purposes herein expressed.

WITNESS MY HAND and official seal at Regions, monroson  
County, State of ALABAMA, this 8<sup>th</sup> day of December, 2023



My Commission expires:

Ronald L. White  
Signature

Ronald L. White  
Print:  
Notary Public, State of ALABAMA